

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

BRANDON HEITMANN,

Debtor.

Chapter 13

Case No. 24-41956-MAR

Hon. Mark A. Randon

**STIPULATION IN SUPPORT OF ENTRY OF PROPOSED  
ORDER AUTHORIZING EMPLOYMENT OF KOTZ SANGSTER  
AS SPECIAL COUNSEL**

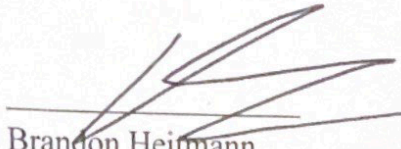
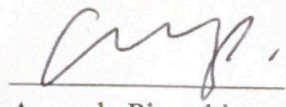
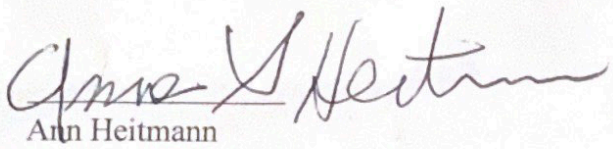
The undersigned parties, by and through their attorneys, stipulate  
to entry of the attached proposed Order.

Approved:

/s/ Robert N. Bassel  
Robert N. Bassel (P48420)  
Attorney for Debtor  
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**ANDREW R. VARA**  
**UNITED STATES TRUSTEE**  
Regions 3 and 9

By /s/ Sean Cowley  
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Brandon Heitmann  
  
Amanda Pisarski  
  
Ann Heitmann  
12/3/24

KOTZ SANGSTER WYSOCKI P.C.

\_\_\_/s/ Tyler Phillips \_\_\_\_\_

By: Tyler P. Phillips (P78280)

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**ORDER GRANTING FURTHER APPLICATION OF THE  
DEBTOR TO EMPLOY KOTZ SANGSTER WYSOCKI, P.C. AS  
SPECIAL COUNSEL**

Upon the Application Of The Debtor to Employ Special Counsel, the waiver of claims by Amanda Pisarski, Debtor's spouse, the Amended Declaration by Tyler Phillips, and the Stipulation in Support of Entry of this Proposed Order by Kotz Sangster, Brandon Heitmann, Amanda Pisarski, Debtor's spouse, and Ann Heitmann, Debtor's mother and the guarantor ("Guarantor") under the engagement agreements between Debtor, Amanda Pisarski and Kotz Sangster, it appearing that KOTZ SANGSTER WYSOCKI, P.C. does not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed, and has no

interest adverse to the estate and sufficient cause exists to grant the application,

NOW, THEREFORE, IT IS HEREBY ORDERED that the Application is granted subject to the requirements in the Application, and subject to the following:

During the pendency of the chapter 13 bankruptcy case, Guarantor shall pay all legal fees and expenses of Kotz Sangster, and neither Debtor nor his spouse nor her company, Resilient Outdoor Living, shall pay those legal fees and expenses, and Guarantor shall not seek reimbursement or contribution from the bankruptcy estate or from the debtor or debtor's spouse or her company, Resilient Outdoor Living.